

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**IN RE: ZANTAC (RANITIDINE)  
PRODUCTS LIABILITY  
LITIGATION**

**MDL NO 2924  
20-MD-2924**

**JUDGE ROBIN L ROSENBERG  
MAGISTRATE JUDGE BRUCE REINHART**

\_\_\_\_\_/

**THIS DOCUMENT RELATES TO:**

**JURY TRIAL DEMANDED**

**Michele Jeffrey, Individually  
and as Representative of Carlton Jeffrey, Deceased**

**SHORT-FORM COMPLAINT – VERSION 2**

The Plaintiff named below, by counsel, files this Short Form Complaint against Defendants named below. Plaintiff incorporates by reference the allegations contained in the Amended Master Personal Injury Complaint (“AMPIC”) in *In re: Zantac (Ranitidine) Products Liability Litigation*, MDL No. 2924 (S.D. Fla). Plaintiff files this Short-Form Complaint – Version 2 as permitted by Pretrial Order No. 31 and as modified by the Court’s Orders regarding motions to dismiss [DE 2532, 2512, 2513, 2515, and 2016].

Plaintiff selects and indicates by completing where requested, the Parties and Causes of Actions specific to this case. Where certain claims require additional pleading or case specific facts and individual information, Plaintiff shall add and include them herein.

Plaintiff, by counsel, alleges as follows:

**I. PARTIES, JURISDICTION, AND VENUE**

**A. PLAINTIFF**

1. Plaintiff **Michele Jeffrey** (“Plaintiff”) brings this action (check the applicable designation):

- ☐ On behalf of [*himself/herself*];
- ☒ In representative capacity as the Executor of Estate, on behalf of the injured party, **Carlton Jeffrey**.

2. Injured Party is currently a resident and citizen of \_\_\_\_\_ and claims damages as set forth below.

—OR—

Decedent died on **January 25, 2016**. At the time of Decedent's death, Decedent was a resident and citizen of **Louisville, Kentucky**.

If any party claims loss of consortium,

3. **Michele Jeffrey** alleges damages for loss of consortium.
4. At the time of the filing of this Short Form Complaint, Consortium Plaintiff is a citizen and resident of **Fort Walton Beach, Florida**.
5. At the time the alleged injury occurred, Consortium Plaintiff resided in **Louisville, Kentucky**.

## **B. DEFENDANTS**

6. Plaintiff names the following Defendants from the Amended Master Personal Injury Complaint in this action:

**a. Brand-Name Manufacturers:**

**GLAXOSMITHKLINE LLC  
GLAXOSMITHKLINE (AMERICA) INC.  
GLAXOSMITHKLINE PLC  
PFIZER INC;  
BOEHRINGER INGELHEIM PHARMACEUTICALS, INC;  
BOEHRINGER INGELHEIM CORPORATION;  
BOEHRINGER INGELHEIM USA CORPORATION;  
SANOFI-AVENTIS U.S. LLC;  
SANOFI US SERVICES INC.  
PATHEON MANUFACTURING SERVICES LLC  
CHATTEM, INC.**

**b. Generic Manufacturers:**

**c. Distributors and Repackager:**

**d. Retailers:**

**e. Others Not Named in the AMPIC:  
DOES 1-100**

**C. JURISDICTION AND VENUE**

7. Identify the Federal District Court in which Plaintiff would have filed this action in the absence of Pretrial Order No. 11 (direct filing) [or, if applicable, the District Court to which their original action was removed]:

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA**

8. Jurisdiction is proper upon diversity of citizenship.

**II. PRODUCT USE**

9. The Injured Party used Zantac and/or generic ranitidine: [*Check all that apply*]

☐ By prescription

☒ Over the counter

10. The Injured Party used Zantac and/or generic ranitidine from approximately **01/2006** to **12/2016**.

**III. PHYSICAL INJURY**

11. As a result of the Injured Party's use of the medications specified above, [*he/she*] was diagnosed with the following specific type of cancer (check all that apply):

Check all that apply	Cancer Type	Approximate Date of Diagnosis
<input type="checkbox"/>	BLADDER CANCER	

<input type="checkbox"/>	BREAST CANCER	
<input type="checkbox"/>	COLORECTAL CANCER	
<input checked="" type="checkbox"/>	ESOPHAGEAL CANCER	01/21/2016
<input type="checkbox"/>	GASTRIC CANCER	
<input type="checkbox"/>	KIDNEY CANCER	
<input type="checkbox"/>	LIVER CANCER	
<input type="checkbox"/>	LUNG CANCER	
<input type="checkbox"/>	PANCREATIC CANCER	
<input type="checkbox"/>	PROSTATE CANCER	
<input type="checkbox"/>	OTHER CANCER: _____	
<input checked="" type="checkbox"/>	DEATH (CAUSED BY CANCER)	01/25/2016

12. Defendants, by their actions or inactions, proximately caused the injuries to Plaintiff.

#### IV. CAUSES OF ACTION ASSERTED

13. The following Causes of Action asserted in the Amended Master Personal Injury Complaint are asserted against the specified defendants in each class of Defendants enumerated therein, and the allegations with regard thereto are adopted in this Short Form Complaint by reference.
14. By checking the appropriate causes of action below, Plaintiff asserts these causes of action based upon the law and applicable Sub-Counts of the following state(s):<sup>1</sup>

Kentucky; Florida

Check all that apply	Count	Cause of Action	States for which the cause of action was asserted in the AMPIC
<input checked="" type="checkbox"/>	I	Strict Products Liability – Failure to Warn through Warnings and Precautions (Against Brand-Name Manufacturer Defendants)	All States and Territories, <b>Except</b> DE, IA, MA, NC, PA, and VA
<input checked="" type="checkbox"/>	II	Negligence – Failure to Warn through Warnings and Precautions (Against Brand-Name Manufacturer Defendants)	All States and Territories, <b>Except</b> LA, NJ, OH, and WA
<input checked="" type="checkbox"/>	III	Strict Products Liability – Failure to Warn through Proper Expiration Dates (Against Brand-Name and Generic Manufacturer Defendants)	All States and Territories, <b>Except</b>

<sup>1</sup> In selecting the relevant states above, Plaintiff reserves all rights to argue choice of law issues at a later time.

Check all that apply	Count	Cause of Action	States for which the cause of action was asserted in the AMPIC
			DE, IA, MA, NC, PA, and VA
<input checked="" type="checkbox"/>	IV	Negligence – Failure to Warn through Proper Expiration Dates (Against Brand-Name and Generic Manufacturer Defendants)	All States and Territories, <b>Except</b> LA, NJ, OH, OK, and WA
<input checked="" type="checkbox"/>	V	Negligence - Failure to Warn Consumers through the FDA (Against Brand-Name and Generic Manufacturer Defendants)	CA, DE, DC, HI, IN, KY, LA, MD, MA, MN, MO, NV, NY, OR, and PA
<input checked="" type="checkbox"/>	VI	Strict Products Liability – Design Defect Due to Warnings and Precautions (Against Brand-Name Manufacturer Defendants)	All States and Territories, <b>Except</b> DE, IA, MA, NC, PA, and VA
<input checked="" type="checkbox"/>	VII	Strict Products Liability – Design Defect Due to Improper Expiration Dates (Against Brand-Name and Generic Manufacturer Defendants)	All States and Territories, <b>Except</b> DE, IA, MA, NC, PA, and VA
<input checked="" type="checkbox"/>	VIII	Negligent Failure to Test (Against Brand-Name and Generic Manufacturer Defendants)	KS, TX
<input checked="" type="checkbox"/>	IX	Negligent Product Containers: (Against Brand-Name and Generic Manufacturers of pills)	All States and Territories
<input checked="" type="checkbox"/>	X	Negligent Storage and Transportation Outside the Labeled Range (Against All Retailer and Distributor Defendants)	All States and Territories
<input checked="" type="checkbox"/>	XI	Negligent Storage and Transportation Outside the Labeled Range (Against All Brand-Name and Generic Manufacturer Defendants)	All States and Territories
<input type="checkbox"/>	XII	Negligent Misrepresentation (Against Brand-Name Manufacturers by Generic Consumers in California)	CA only
<input type="checkbox"/>	XIII	Reckless Misrepresentation (Against Brand-Name Manufacturers by Generic Consumers in Massachusetts)	MA only
<input checked="" type="checkbox"/>	XIV	Unjust Enrichment (Against All Defendants)	All States and Territories
<input checked="" type="checkbox"/>	XV	Loss of Consortium (Against All Defendants)	All States and Territories
<input checked="" type="checkbox"/>	XVI	Wrongful Death (Against All Defendants)	All States and Territories

If Count XV or Count XVI is alleged, additional facts supporting the claim(s):  
Count XV: Michele Jeffrey married Carlton Jeffrey on 11/08/1997.  
Count XVI: Esophageal cancer is listed as cause of death on Plaintiff's death  
certificate.

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**V. JURY DEMAND**

15. Plaintiff hereby demands a trial by jury as to all claims in this action.

**VI. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff has been damaged as a result of Defendants' actions or inactions and demands judgment against Defendants on each of the above-referenced causes of action, jointly and severally to the full extent available in law or equity, as requested in the Amended Master Personal Injury Complaint.

DATED: 15th day of December, 2021

Respectfully Submitted,



By: \_\_\_\_\_

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